

REMARKS

Applicants would like to thank the Examiner for the time spent during the telephone interview with the Applicants' representative on June 5, 2002. During the telephone interview, the differences between the *Sanchez et al.* reference and claim 1 of the present application were observed. Several issues were discussed, as are explained below.

This amendment and the corresponding remarks are in response to the Examiner's Final Rejection mailed May 3, 2002. Reconsideration and allowance of the presently pending claims is respectfully requested.

Upon entry of the amendment, claims 12-21 are canceled and claims 1-11 remain pending in the present application. Claim 1 is amended to further distinguish the present invention from the prior art, as described below. Claim 6 is amended to maintain consistency with an antecedent. It is believed that the foregoing amendment adds no new matter to the present application.

Response To Claim Rejections Under 35 U.S.C. 103

Claims 1-11 have been rejected under 35 U.S.C. 103(a) as being unpatentable over *Sanchez et al.* (U.S. Patent No. 6,086,415). Applicants respectfully traverse this rejection on the grounds that *Sanchez et al.* does not teach or render obvious claim 1 as amended. Furthermore, claims 2-11, which depend from claim 1, are believed to be allowable over the prior art of record for at least the reasons mentioned with respect to claim 1.

With respect to claim 1 (twice amended), the Applicants assert that the reference to *Sanchez et al.* does not include the limitation of "***a plurality of sub-panels***". Instead, *Sanchez et al.* disclose a single panel (jack holder 22) connected to the main panel 24. As discussed in the telephone interview, it is essential that the jack holder 22 of *Sanchez et al.* be formed of a single unitary piece of material, so that when the connectors are pre-mounted on the jack holder 22, the jack holder may be easily coupled to the front panel 24 such that the connectors extent through the front panel. See, for example, col. 3, lines 3-14 of *Sanchez et al.*

Moreover, there is no motivation in the prior art to alter *Sanchez et al.* in such a way as to divide the jack holder 22 into a plurality of panels, nor would it be

beneficial to do so. In fact, it would be contrary to the intention and purposes of *Sanchez et al.* to divide the jack holder 22 since *Sanchez et al.* is concerned about simplifying the attachment of the jack holder 22 to the front panel 24. By dividing the jack holder 22, more connections would have to be made, which would complicate the device of *Sanchez et al.* and make the device less desirable. For at least this reason, one of ordinary skill in the art would not be motivated to divide the jack holder 22, thereby making the device less desirable and more complicated.

Sanchez et al. is further concerned about aligning the openings of the jack holder 22 with the openings of the front panel 24. Altering the device of *Sanchez et al.* to include a plurality of jack holders would likely cause alignment problems since it would be required to attach a plurality of jack holders 22 to the front panel instead of just one. Again, this would result in a less desirable device and there would therefore not be a motivation of one of ordinary skill in the art to complicate *Sanchez et al.* in this way. Therefore, the altering of *Sanchez et al.* would not provide a reasonable expectation of success as required in MPEP 2143.

Furthermore, the prior art does not teach or suggest all of the claimed limitations, which again is a requirement for establishing a *prima facie* case of obviousness as required in MPEP 2143. Not only does the prior art not teach or suggest the claim limitations, but also the prior art fails to suggest or motivate one of ordinary skill in the art to modify *Sanchez et al.*, as also required in MPEP 2143. Additionally, since the jack holder 22 of *Sanchez et al.* extends along the entire length of the main panel 24, it would be impossible for *Sanchez et al.* to accommodate additional sub-panels on the main panel.

Furthermore, the Applicants contend that *Sanchez et al.* does not disclose the limitation that "*each one of the plurality of sub-panels spans across a respective cut-out*" as is claimed in claim 1. The unitary piece of the jack holder 22 of *Sanchez et al.* spans across all of the cut-outs of the main panel 24. With this one unitary piece, it would be impossible for *Sanchez et al.* to accommodate additional sub-panels. Furthermore, *Sanchez et al.* does not teach or render obvious the limitation that each sub-panel spans across a respective cut-out. Therefore, Applicants believe that claim 1, as amended, is not anticipated by *Sanchez et al.* and is allowable over the prior art of record.

Applicants deem claims 2-11 to be allowable for at least the reasons stated above with respect to claim 1, from which these claims depend either directly or indirectly. Furthermore, claims 2-11 contain limitations which further distinguish the present application from the prior art. For instance, claims 3 and 4 comprise a bottom support and a top support, respectively, each of which provides "***support for the main panel on the rack.***" *Sanchez et al.* does not describe a top or bottom support for providing support for the main panel.

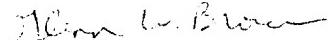
Furthermore, *Sanchez et al.* fails to disclose a means for removably securing that further comprises a "***threaded structure***" as claimed in dependent claim 7, since *Sanchez et al.* instead indicates that the engagement members 38 and 40 of the panel 22 is engaged with the engagement flanges of main panel 24. There is no indication in the reference to the securing means having a "***threaded structure***." Applicants respectfully requests that the 35 U.S.C. 103(a) rejection be withdrawn.

Applicants believe that neither *Sanchez et al.* nor the other prior art references made of record affect the patentability of the presently pending claims. For at least these reasons, Applicants respectfully request the withdrawal of the 35 U.S.C. 103(a) rejection. It is believed that the claims as amended are now in condition for allowance and it is requested that Examiner kindly pass this application to issuance.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all rejections have been traversed, and that claims 1-11 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

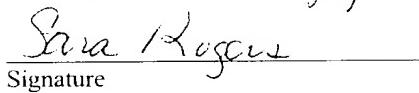


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I hereby certify that this correspondence is faxed
to: Assistant Commissioner for Patents,
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Signature

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MARKED-UP VERSION OF AMENDED CLAIMS TO SHOW CHANGES MADE

The following is a marked-up version of the amended claims:

1. (Twice Amended) A modular system interface comprising:
 - a main panel configured to be attachable to a rack, the main panel [and] including a plurality of cut-outs; [and]
 - a plurality of sub-panels configured to be attachable to the main panel, wherein each of the plurality of sub-panels [sub-panel] spans across a respective cut-out and is individually attached to the main panel; and
 - a plurality of connectors configured to be attachable to the plurality of sub-panels, wherein each of the plurality of sub-panels supports a respective predetermined connector.

6. (Amended) The modular system interface of claim 1, wherein the main panel further comprises:
means for removably securing the [at least one sub-panel] plurality of sub-panels.

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